

**FILED**

APR 24 2025

Heidi D. Campbell, Clerk  
U.S. DISTRICT COURT

## UNITED STATES DISTRICT COURT

for the

Northern District of Oklahoma

United States of America

v.

STEPHEN DALE HOMER

Defendant(s)

Case No.

25-mj-345-CDL

FILED UNDER SEAL

## CRIMINAL COMPLAINT

**SEALED**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 11, 2022 to on or about April 6, 2025 in the county of Tulsa in the Northern District of Oklahoma, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. §§ 2251(a) and 2251(e)	Sexual Exploitation of a Child (Production of Child Pornography)
18 U.S.C. §§ 2252(a)(4)(B) and (b) (2)	Possession of and Access with Intent to View Child Pornography

This criminal complaint is based on these facts:

See Attached Affidavit by SA Blair Newman, FBI.

 Continued on the attached sheet.

Complainant's signature

Special Agent Blair Newman, FBI

Printed name and title

Sworn to before me by phone.

Date: April 24, 2025

Judge's signature

City and state:

Tulsa, OK

Christine D. Little, United States Magistrate Judge

Printed name and title

**IN THE UNITED STATES DISTRICT COURT  
FOR NORTHERN DISTRICT OF OKLAHOMA**

**Affidavit in Support of a Complaint and Arrest Warrant**

I, Blair Newman, being duly sworn, hereby depose and state as follows:

**Introduction and Agent Background**

1. I am a Special Agent of the Federal Bureau of Investigation (FBI) assigned to the Oklahoma Safe Streets Task Force based in Tulsa, Oklahoma. My duties as a Special Agent include investigating violations of federal criminal law and threats to national security. In addition to formal training, I have received extensive training through my involvement in numerous investigations working alongside experienced law enforcement officers at both the federal and local level. My investigations include, but are not limited to, drug and gang violations, violent crimes, Indian Country violations, and crimes against children.

2. As part of my duties as a Special Agent, I investigate criminal violations relating to crimes of general applicability, to include Sexual Exploitation of a Child (Production of Child Pornography), in violation of 18 U.S.C. §§ 2251(a) and (e), and Possession of and Access with Intent to View Child Pornography, in violation of 18 U.S.C. §§ 2252(a)(4)(B) and (b)(2).

3. The facts and circumstances of this investigation set forth in this affidavit are based on my personal observations, knowledge obtained from other law enforcement officers, my review of documents related to this investigation, conversations with others who have personal knowledge of the circumstances

described herein, and a review of open-source information. This affidavit is submitted for the limited purpose of establishing probable cause for the requested warrant, and therefore does not include every fact I have learned during the course of this investigation.

4. Based on my training, research, experience, and the facts as set forth in this affidavit, there is probable cause to believe that STEPHEN DALE HOMER (DOB: xx-xx-1967; SSN: XXX-XX-7671) has violated:

- 18 U.S.C. §§ Sections 2251(a) and (e) – Sexual Exploitation of a Child (Production of Child Pornography)
- 18 U.S.C. §§ 2252(a)(4)(B) and (b)(2) – Possession of and Access with Intent to View Child Pornography

Title 18, United States Code, Sections 2251(a) and (e) prohibits:

- Any person who employs, uses, persuades, induces, entices, or coerces any minor to engage in, or who has a minor assist any other person to engage in, or who transports any minor in or affecting interstate or foreign commerce, or in any Territory or Possession of the United States, with the intent that such minor engage in, any sexually explicit conduct for the purpose of producing any visual depiction of such conduct or for the purpose of transmitting a live visual depiction of such conduct, shall be punished as provided under subsection (e), if such person knows or has reason to know that such visual depiction will be transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce or mailed, if that visual depiction was produced or transmitted using materials that have been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including by computer, or if such visual depiction has actually been transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce or mailed.

Title 18, United States Code, Sections 2252(a)(4)(B) and (b)(2) prohibits:

- Any person from knowingly possessing or accessing with the intent to view, or attempting or conspiring to possess or access with the intent to view, one or more books, magazines, periodicals, films, video tapes, or other matter which contain any visual depiction that has been mailed, or has been shipped or transported using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce, or which was produced using materials which have been mailed or so shipped or transported, by any means including by computer, if the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct and such visual depiction is of such conduct.

It is therefore respectfully requested this Court issue a complaint and arrest warrant for STEPHEN DALE HOMER.

### **Definitions**

5. The following definitions, inclusive of all definitions contained in 18 U.S.C. § 2256, apply to this affidavit and the attachments incorporated herein:
  - A) "Child pornography," as defined in 18 U.S.C. § 2256(8), is any visual depiction, including any photograph, film, video, picture, or computer or computer-generated image or picture, whether made or produced by electronic, mechanical or other means, of sexually explicit conduct, where (a) the production of the visual depiction involved the use of a minor engaged in sexually explicit conduct, (b) the visual depiction is a digital image, computer image, or computer-generated image that is, or is indistinguishable from, that of a minor engaged in sexually explicit conduct, or (c) the visual depiction has been created, adapted, or

- modified to appear that an identifiable minor is engaged in sexually explicit conduct;
- B) “Internet Protocol address” or “IP address” refers to a unique number used by a computer or electronic device to access the Internet. IP addresses can be dynamic, meaning that the ISP assigns a different unique number to a computer every time it accesses the Internet. IP addresses may also be static, which means the ISP assigns a user’s computer a particular IP address that is used each time the computer accesses the Internet;
- C) The “Internet” is a global network of computers and other electronic devices that communicate with each other. Due to the structure of the Internet, connections between devices on the Internet often cross state and international borders, even when the devices communicating with each other are in the same state;
- D) “Minor,” as defined in 18 U.S.C. § 2256(1), refers to any person under the age of eighteen years;
- E) “Sexually explicit conduct,” as defined in 18 U.S.C. § 2256(2), means actual or simulated (a) sexual intercourse, including genital-genital, oral-genital, anal-genital, or oral-anal, whether between persons of the same or opposite sex; (b) bestiality; (c) masturbation; (d) sadistic or masochistic

abuse; or (e) lascivious exhibition of the genitals or pubic area of any person; and

F) “Visual depiction,” as defined in 18 U.S.C. § 2256(5), includes undeveloped film and videotape, data stored on computer disc or other electronic means which is capable of conversion into a visual image, and data which is capable of conversion into a visual image that has been transmitted by any means, whether or not stored in a permanent format.

### **Probable Cause**

6. On April 11, 2025, in Tulsa, Oklahoma, an adult sex worker met with Officer Inglee with the Tulsa Police Department’s Human Trafficking / Vice Unit and Officer Karla Perez to report an incident. The sex worker alleged that she agreed to an act of solicitation with a male at the Best Western Airport, located at 222 N. Garnett Rd., Tulsa, Oklahoma. The sex worker met the male, who she claimed was Stephen Dale Homer (hereafter “HOMER”), at the hotel, and consensual sexual intercourse occurred. The sex worker alleged that HOMER was a pilot.

7. After the intercourse, HOMER began showing the sex worker files of child pornography. The victim described one of the files as a female minor she believed to be between the age of 4 to 5 years old. The female minor had her legs spread open, and a “grown hairy hand” was manipulating the female child’s exposed vagina. The sex worker observed multiple videos like the one described. The sex worker questioned HOMER about the videos, and HOMER punched her in the left eye with a closed fist.

8. The sex worker alleged HOMER showed her pornographic videos of his daughter. The sex worker stated HOMER told her he would drug his daughter and talked about how much she enjoyed having sexual intercourse with him. The sex worker believed the videos were older, as HOMER looked younger, and the female child looked to be between the ages of 15 to 16 years old. HOMER told the sex worker that his daughter was 30 years-old, then told her she was 18 years-old, and that she was a senior in high school. HOMER stated his daughter was a therapist now. The sex worker stated HOMER asked her to have sexual intercourse with his 14-year-old son.

9. The sex worker suggested HOMER should clean up, so he went to the shower. The sex worker reported that she stole HOMER's Apple iPhone and Apple iPad and then ran from the hotel room. The sex worker stated she called HOMER's wife to report what she discovered, but HOMER's wife was not happy the sex worker was contacting her. The sex worker stated she contacted HOMER's wife to return the devices but decided to turn them into law enforcement.

10. The Tulsa Police Department Sexual Predator Investigations and Digital Evidence Recovery (SPDR) Unit was assigned to investigate this incident. Detective Justin Wolzen was assigned as the lead investigator. Detective Wolzen authored State of Oklahoma legal process to conduct a forensic examination and review of HOMER's Apple iPhone and Apple iPad. The legal process was approved by Special Judge April L. Seibert from the Tulsa County District Court on 4/22/2025 at 1019 hours. Detective Wolzen conducted a forensic examination on

the Apple iPhone, and Detective Raymond Ackermann conducted a forensic examination on the Apple iPad.

11. Detective Wolzen conducted a cursory review of the content within the Apple iPhone. Detective Wolzen discovered at least one (1) image file of child pornography and two (2) video files of child pornography. One of the video files is 2:55:07 in length and has a combination of images and videos in the file. There is a video of a female minor that appears to be between the age of 9 to 11 years old. The video starts near the 2:21 mark in the main video file. The female minor is standing with what appears to be pajamas with a children's cartoon character on them. There is an adult male hand that appears from behind the camera that removes the shirt from the female minor's body. The female minor lays on a bed and removes her pants and underwear, exposing her vagina. The male points the camera toward his waist area and his erect penis is exposed. The male gets on his knees and places his mouth around the female minor's vagina, then stands up to insert his erect penis into the female minor's vagina. The video cuts to another video within the file around the 2:24 mark. The video was created on 1/11/2022 at 4:15:55 AM UTC.

12. On 4/23/2025, Detective Wolzen compared the adult male depicted in the video with HOMER's driver's license photo and it appeared to be the same individual. The video appears to have been recorded in the past as HOMER has dark hair in the video. In the recent "selfie" style images on HOMER's cell phone, it appears HOMER has little to no hair, and the hair he does have is gray in color. HOMER appears to have gained weight which causes him to look heavier in the

same “selfie” style image recorded on April 6, 2025. The female minor described in the video also appears to be in another video discovered on the cell phone. The female minor exposes her vagina to the camera and uses her hands to spread her vagina open. The female minor is seated on a bed with bedding that is purple in color and has cartoon princesses on it.

13. There is another video of HOMER recording a sexual encounter with a male. HOMER and the male are seated on top of purple blanket with cartoon princesses on them. The two blankets appear identical to one another. The video file of HOMER and the other adult male was recorded in Thailand, based on the file’s location data.

14. There is an image file of HOMER holding a glass pipe up near his lips with an unknown substance in it. There is a torch lighter near the base of the glass pipe, and the lighter is lit. The base of the glass pipe has a dark colored substance bunched up near the bottom. Based on my training and experience, appears HOMER is inhaling a narcotic from the glass pipe.

15. There is an image of HOMER in a pilot uniform that appeared to be a “selfie” from a cockpit. It was later confirmed that HOMER is a pilot/First Officer with PSA, which is a subsidiary of American Airlines.

16. There are two images of two male minors’ Thailand passports. The last name of both male minors is the same last name as HOMER’s current wife’s maiden name. HOMER’s current wife is from Thailand. One of the male’s has a birthdate in 2010 which would make him 14 years old. There is an image of HOMER, a female,

and the two male minors dressed up at an event together. HOMER asked the sex worker if she would take his 14-year-old son's virginity, and it appears a 14-year-old male may be residing with HOMER.

17. Additionally, Detective Wolzen performed a cursory review of the content on the Apple iPad and discovered at least 15 video files and 10 image files of child pornography on the iPad.

18. One of the video files has a female minor that appears to be between the age of 4 to 6 years old. The female minor is laying on her back with the camera focused on her face. The female minor has her mouth and eyes open. There is an adult male's erect penis next to the female minor's open mouth. The erect penis has a hand sliding along the shaft quickly, causing semen to ejaculate from it and onto the female minor's face. This causes the female minor to slam her eyes closed due to the semen getting into her eye. The female minor places one of her hands on the eye that has semen on it to prevent anymore from going in. The erect penis continues to ejaculate semen onto the female minor's face and mouth. The adult male thrusts his erect penis into the female minor's mouth. The video file is 00:31 seconds in length.

### **Conclusion**

19. Based on the information set forth in this Affidavit, I submit there is probable cause to believe that STEPHEN DALE HOMER (DOB: XX-XX-1967; SSN: XXX-XX-7671) has violated:

- 18 U.S.C. § 2251(a) and (e) – Sexual Exploitation of a Child (Production of Child Pornography)

- 18 U.S.C. § 2252(a)(4)(B) – Possession of and Access with Intent to View Child Pornography

Respectfully Submitted,



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Blair Newman  
Special Agent  
Federal Bureau of Investigation

Subscribed and sworn via phone on the 24<sup>th</sup> day of April, 2025.



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CHRISTINE D. LITTLE  
UNITED STATES MAGISTRATE JUDGE